

1 JOSHUA A. SLIKER, ESQ.
2 Nevada Bar No. 12493
3 **JACKSON LEWIS P.C.**
4 300 S. Fourth Street, Suite 900
5 Las Vegas, Nevada 89101
6 Telephone: (702) 921-2460
7 Email: joshua.sliker@jacksonlewis.com

8 *Attorneys for Defendant*
9 *Turner Staffing Group, LLC*

10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 WADE ALLEN, individually, and on behalf of
13 all others similarly situated,

14 Plaintiff,

15 vs.

16 BARRICK GOLD OF NORTH AMERICA,
17 INC. d/b/a NEVADA GOLD MINES LLC; and
18 TURNER STAFFING GROUP, LLC,

19 Defendants.

20 Case No.: 3:24-cv-00231-CLB

21 **ORDER GRANTING STIPULATION
22 EXTENDING TIME FOR ALL
23 DEFENDANTS TO RESPOND TO
24 PLAINTIFF'S COMPLAINT (ECF
25 NO. 1)**

26 **(THIRD REQUEST)**

27 Defendant TURNER STAFFING GROUP, LLC ("Turner" Or "Defendant"), by and
28 through its counsel of record, the law firm of Jackson Lewis P.C., Defendant NEVADA GOLD
MINES, LLC (erroneously sued as Barrick Gold of North America, Inc d/b/a Nevada Gold Mines,
LLC), by and through their counsel, by and through their counsel of record, the law firm of Simons
Hall Johnston PC ("NGM"), and Plaintiff WADE ALLEN ("Plaintiff"), by and through his counsel
of record, the law firms of Brown, LLC and Roger Wenthe, PLLC, hereby stipulate and agree to
extend the time for Defendants Turner and NGM to file their respective responses to Plaintiff's
Complaint (ECF No. 1) up to and including **September 13, 2024** based on the following:

1. On July 8, 2024, Plaintiff and Turner stipulated to extend Turner's time to respond
to Plaintiff's Complaint to July 19, 2024 (First Request) (ECF No. 8), which the Court granted on
July 9, 2024. ECF No. 9.

2. On July 16, 2024, Plaintiff and NGM stipulated to extend NGM's time to respond
to Plaintiff's Complaint to July 31, 2024 (First Request) (ECF No. 12), which the Court granted on

1 July 17, 2024. ECF No. 14.

2 3. On July 24, 2024, the Parties stipulated to extend the time for all Defendants to
3 respond to Plaintiff's Complaint to August 26, 2024 (Second Request) (ECF No. 15), which the
4 Court granted that same day. ECF No. 16.

5 4. The Parties are continuing to explore whether it may be possible to resolve this case
6 without continued litigation. One issue that the Parties are working through is the availability of
7 certain time-and-pay related information from a non-party to this case.

8 5. To appropriately focus their respective efforts and resources, the Parties have agreed
9 to further extend the time for Defendants to file their respective responses to Plaintiff's Complaint
10 to September 13, 2024.

11 6. This is the third stipulation to extend the time for Turner and NGM to respond to
12 Plaintiff's Complaint.

13 7. The Parties are working together in good faith and believe these circumstances
14 constitute good cause for extending Defendants' time to respond to the Complaint. *See Fed. R. Civ.*
15 P. 6(b)(1).

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1
2 8. The Parties are not waiving, relinquishing, or otherwise impairing any claim,
3 defense, argument, or other right they may have by virtue of entering into this Stipulation. See
4 *Szanto v. Marina Marketplace 1, LLC*, No. 3:11-cv-00394-RCJ-VPC, 2013 U.S. Dist. LEXIS
5 168028, at *10 (D. Nev. Nov. 26, 2013).

6 DATED this 26th day of August, 2024.

7 BROWN, LLC

JACKSON LEWIS P.C.

8 /s/ Nicholas Conlon

NICHOLAS CONLON, ESQ.
9 *Admitted Pro Hac Vice*
10 111 Town Square Place, Ste. 400
 Jersey City, New Jersey 07310

/s/ Joshua A. Slicker

JOSHUA A. SLIKER, ESQ.
Nevada Bar No. 12493
300 S. Fourth Street, Suite 900
Las Vegas, Nevada 89101

11 ROGER WENTHE, ESQ.

12 ROGER WENTHE, PLLC
 Nevada Bar No. 8920
 2831 St. Rose Pkwy., Suite 200
 Henderson, Nevada 89052

Attorneys for Defendant

Turner Staffing Group, LLC

SIMONS HALL JOHNSTON PC

15 *Attorneys for Plaintiff*

16 Wade Allen

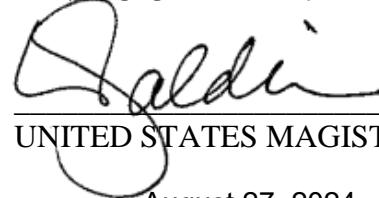
/s/ Anthony Hall

ANTHONY L. HALL, ESQ.
Nevada Bar No. 5977
JONATHAN A. MCGUIRE, ESQ.
Nevada Bar No. 15280
690 Sierra Rose Dr.
Reno, Nevada 89511

19 *Attorneys for Defendant*

Nevada Gold Mines

21 **IT IS SO ORDERED.**


22 _____
 UNITED STATES MAGISTRATE JUDGE
23
24
25
26
27
28

DATED: August 27, 2024